

**BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA
DOCKET NO. 2020-229-E**

In the Matter of:)	
Dominion Energy South Carolina,)	PETITION TO INTERVENE
Incorporated's Establishment of a Solar)	OUT OF TIME OF THE
Choice Metering Tariff Pursuant to S.C. Code)	NORTH CAROLINA
Ann. Section 58-40-20)	SUSTAINABLE ENERGY
)	ASSOCIATION

Pursuant to Rule 103-825 of the rules and regulations of the South Carolina Public Service Commission ("Commission"), the North Carolina Sustainable Energy Association ("NCSEA") hereby respectfully petitions to intervene in the above-captioned generic docket and seeks to do so out of time. In support of this petition, NCSEA states as follows:

1. NCSEA is a non-profit corporation formed under the laws of North Carolina, with individual, business, and government members located and doing business in both North Carolina and South Carolina. NCSEA's mission is to promote a sustainable future through the use of renewable energy and energy efficiency programs. NCSEA seeks to achieve its objectives by advocating for public policies that encourage the responsible technological and market development of renewable energy and energy efficiency, including all aspects of demand side management, a smart grid, energy storage, and vehicle electrification.
2. NCSEA's membership includes businesses that sell, install, and lease customer-sited solar generation in Dominion Energy South Carolina, Incorporated's ("Dominion") service territory in South Carolina and also in the territory of Dominion's related utility entity, Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina. These member businesses will be directly impacted by the outcome of this proceeding. Additionally, NCSEA's membership includes individuals and businesses who have

installed or leased customer-sited solar generation, who will also be directly impacted by the outcome of this proceeding.

3. This proceeding was opened on September 17, 2020 to establish the Solar Choice Metering Tariff of Dominion, as required by S.C. CODE ANN. § 58-40-20(F).

4. NCSEA's participation in this docket will bring critical insight, knowledge, and understanding to the proceeding.

5. The name and principal business address of the Petitioner are:

North Carolina Sustainable Energy Association
4800 Six Forks Road
Suite 300
Raleigh, NC 27609

6. Pursuant to Rule R.103-804(5) of the Commission's Rules of Practice and Procedure, NCSEA is represented in this proceeding by counsel who is duly licensed to practice law in the State of South Carolina: and requests that undersigned counsel be added to the official service list:

Jeffrey W. Kuykendall
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127 King St., Ste. 208
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7. NCSEA consents to service via electronic mail and requests that all communications regarding this docket should be directed to NCSEA's counsel of record, with copies to:

Peter H. Ledford
General Counsel and Director of Policy
North Carolina Sustainable Energy Association

4800 Six Forks Road, Suite 300
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8. NCSEA and its members have a substantial interest in the subject matter of this proceeding.
9. No other party will adequately represent NCSEA's interest in this case.
10. The original scheduling order, issued by the Commission on September 16, 2020 in Docket No. 2019-182-E, did not include a deadline for parties to file petitions to intervene.
11. No party has filed testimony in this docket, and no party will be prejudiced by NCSEA being allowed to intervene out-of-time. Furthermore, NCSEA being allowed to intervene out-of-time will not delay the proceeding.

WHEREFORE, for the reasons set forth above, NCSEA respectfully requests that the Commission allow it to intervene in this proceeding and to participate fully as a party in order to protect its unique and substantial interest in this case.

Respectfully submitted,

/s/ Jeffrey W. Kuykendall
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Attorney for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing Petition to Intervene by hand delivery, first class mail deposited in the U.S. mail, postage pre-paid, or by email transmission with the party's consent.

This the __1st__ day of December, 2020.

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